



WASHINGTON, DC

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April 30, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Notice of *Ex Parte* Communication, MB Docket No. 18-119

Dear Ms. Dortch:

On April 29, 2019, the following individuals as well as the undersigned participated in a telephone conference with representatives of the Audio Division to discuss one aspect of the draft order released in the above-referenced proceeding with respect to the rules for FM translator interference complaints. The participants in the call were: Caroline Beasley, CEO, Beasley Media Group, LLC (“Beasley”); Mike Cooney, CTO, Beasley; Sally Buckman, counsel to Beasley; Jeff Littlejohn, EVP, Engineering & Systems, iHeart Communications, Inc., as debtor in possession (“iHeart”); Marissa Repp, counsel to iHeart; and Al Shuldiner, Jim Bradshaw, Lisa Scanlon and Christine Goepp from the Audio Division of the Media Bureau.

Beasley and iHeart discussed that if the Commission uses a sliding scale to determine the minimum number of complaints that are needed for an FM translator interference complaint to be sustained, the required number of complaints should be tied to the population of the area of interference, not the population of a station’s entire service area. iHeart and Beasley explained that tying the number of complaints to the population of the area of interference will further the Commission’s goal of protecting existing service, but that tying the number of required complaints to the population of the entire service area of the complaining station separates the required



Marlene H. Dortch, Esq.  
April 30, 2019  
Page 2

number of complaints from the actual interference and may make it impossible to support a legitimate claim of interference. Beasley and iHeart stated that they will file an *ex parte* letter in the above-referenced proceeding to provide further information regarding this matter.

Respectfully submitted,

/s/ Sally A. Buckman  
Sally A. Buckman  
*Counsel to Beasley Media Group, LLC*

cc: Albert Shuldiner  
James Bradshaw  
Lisa Scanlon  
Christine Goepp